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UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT  
12 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
13

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 v.

17 SALVADOR GALVAN,  
aka "Salvador Galvan, Jr.,"

18 Defendant.  
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**No. CV 25-1919**

**UNITED STATES OF AMERICA'S  
APPLICATION FOR ISSUANCE OF:**

**WRIT OF CONTINUING  
GARNISHMENT TO GARNISHEE  
[28 U.S.C. § 3205(b)]**

**and**

**CLERK'S NOTICE OF  
ENFORCEMENT TO DEBTOR  
[28 U.S.C. § 3202(b)]**

**[CALIFORNIA PUBLIC EMPLOYEES'  
RETIREMENT SYSTEM ("CalPERS")]**

1 The United States of America, in accordance with 28 U.S.C. § 3205(b)(1),  
2 applies for a Court order issuing a writ of continuing garnishment in order to secure  
3 payment on the criminal judgment debt entered in *United States v. Salvador Galvan*,  
4 CR 17-0283-JLS. The United States also seeks the issuance of a clerk's notice pursuant  
5 to 28 U.S.C. § 3202(b), as prepared and submitted by the United States as an attachment  
6 to this application.

7 On November 3, 2017, the Court imposed the following criminal judgment debt  
8 against defendant Salvador Galvan, aka "Salvador Galvan, Jr." ("Defendant"):

- 9 ■ Restitution: \$3,721,924.00; and
- 10 ■ Special assessment: \$100.00.

11 Defendant's social security number is \*\*\*-\*\*-7993, and Defendant resides in  
12 Compton, California.

13 As of March 3, 2025, the principal balance of Defendant's criminal debt is  
14 \$3,675,225.98. Demand for payment of the above-stated debt was made upon Defendant  
15 more than thirty (30) days before the date of this application, and Defendant has not paid  
16 the amount due.

17 Garnishee California Public Employees' Retirement System<sup>1</sup> ("Garnishee") is  
18 believed to owe or will owe, money or property to Defendant, or is in possession of  
19 property of Defendant, and Defendant has a substantial nonexempt interest in the  
20 property. Specifically, it is believed that funds, assets, or property belonging to  
21 Defendant are currently in Garnishee's possession, custody, or control. By and through  
22 this writ of continuing garnishment, the United States seeks to take the funds or property  
23 from Defendant to secure payment towards the criminal judgment debt. 28 U.S.C.  
24 § 3205(b)(1)(C).

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28 <sup>1</sup> The California Public Employees' Retirement System is commonly known as  
"CalPERS."

1 Specifically, the funds, assets, or property in this case include both employee  
2 contributions paid by Defendant to Garnishee during the period of time in which he has  
3 forfeited rights to a CalPERS pension because of his felony conduct pursuant to Cal.  
4 Govt. Code § 7522.72,<sup>2</sup> and to the extent that Defendant made contributions to  
5 Garnishee prior to the commission of his felony conduct.

6 The name and address of Garnishee or the Garnishee's authorized agent are:

7 CalPERS Legal Office  
8 400 P Street, 3d Floor  
9 Sacramento, CA 95814

10 DATED: March 5, 2025.

Respectfully submitted,

11 JOSEPH T. MCNALLY  
12 Acting United States Attorney  
13 LINDSEY GREER DOTSON  
14 Assistant United States Attorney  
15 Chief, Criminal Division

16 /s/ Robert I. Lester

17 ROBERT I. LESTER  
18 Assistant United States Attorney

19 Attorneys for Plaintiff  
20 UNITED STATES OF AMERICA  
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23 <sup>2</sup> Section 7522.72 is part of the California Public Employees' Pension Reform  
24 Act of 2013 (§ 7522 *et seq.*; PEPPRA). It provides, in relevant part, that "[i]f a public  
25 employee is convicted by a state or federal trial court of any felony under state or federal  
26 law for conduct arising out of or in the performance of his or her official duties, . . . he or  
27 she shall forfeit all accrued rights and benefits in any public retirement system in which  
28 he or she is a member to the extent provided in subdivision (c) and shall not accrue  
further benefits in that public retirement system, effective on the date of the conviction."  
Section 7522.72(b)(1). *See, e.g., Estrada v. Public Employees' Retirement System*,  
95 Cal. App. 5th 870, 313 Cal. Rptr. 3d 732 (2023) (applying Government Code  
§ 7522.72).